

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

NICOL JACKSON,

Plaintiff,

V.

**KINGDOM HALL OF JEHOVAH
WITNESS, *et al.*,**

Defendants.

Case No. 1:22-cv-01133-STA-jay
Chief Judge Anderson
Magistrate Judge York

DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT

Defendants Watch Tower Bible and Tract Society of Pennsylvania, Watchtower Bible and Tract Society of New York, Inc., and Paris TN Congregation of Jehovah’s Witnesses (collectively, “Defendants”) move to dismiss the Amended Complaint in this action pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure because Plaintiff’s claims in this action are time-barred. Plaintiff waited nearly three decades after any the accrual of any possible claims she may have had to file suit against Defendants, and the limitations period provided under applicable Tennessee law has, therefore, long since expired. Accordingly, well settled law requires Plaintiff to plead facts plausibly establishing that a recognized tolling doctrine applies to make her claims timely. Because she has not done so, she has failed to state a claim against Defendants.

This motion is supported by the simultaneously filed Memorandum, any matters subject to judicial notice, and any further submissions or arguments of counsel as may properly come before this Court.

Defendants respectfully ask that their Motion to Dismiss the Amended Complaint be granted and that the Court dismiss Plaintiff's claims against them with prejudice.

Respectfully submitted,

s/ Robb S. Harvey

Robb S. Harvey (Tenn. BPR No. 11519)
Michael A. Cottone (Tenn. BPR No. 33253)
WALLER LANSDEN DORTCH & DAVIS, LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219
(615) 244-6380
robb.harvey@wallerlaw.com
michael.cottone@wallerlaw.com

*Counsel for Defendants Watch Tower Bible and Tract
Society of Pennsylvania, Watchtower Bible and Tract
Society of New York, Inc., and Paris TN
Congregation of Jehovah's Witnesses*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed using the Court's CM/ECF System on July 29, 2022. Since Plaintiff does not yet have access to the Court's CM/ECF System, the undersigned will ask his team members to send a copy of this submission via email and via first-class U.S. Mail, postage pre-paid, upon Plaintiff:

Nicol Jackson
809 S Kedvale
Chicago, Illinois 60624
msnicoltjackson@gmail.com

s/ Robb S. Harvey